

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JOHN MICHAEL COHAN, *et al.*,

Plaintiffs

vs.

**COLUMBIA SUSSEX MANGEMENT, LLC
d/b/a MELVILLE MARRIOTT,**

Defendant

Civil Action No. 12-cv-3203(JS)(AKT)

DEFENDANT'S DISCOVERY STATUS REPORT

Defendant Columbia Sussex Management, LLC ("Defendant" or "CSM"), by its undersigned counsel, respectfully submits this Discovery Status Report in compliance with paragraph III of the Court's November 19, 2012 Initial Case Management and Scheduling Order:

1. Defendant served its Answers and Objections to Plaintiffs' First Set of Interrogatories and First Request For Production of Documents on March 1, 2013. Plaintiffs' counsel has made no attempt to contact Defendant's counsel to discuss or dispute Defendants' objections.

Defendant has produced over 9,200 pages of documents to Plaintiffs, however, paper discovery is not complete. Defendant has, at great expense, contracted with Digital Technologies, Inc. ("DTI", <http://dtiglobal.com/about-us/>) to process the several dozen gigabytes of electronically stored information extracted from Defendant's computer systems. That processing is still under way, and review of the voluminous information retrieved for relevance, responsiveness, and privilege, is pending.

2. Defendant's Interrogatory Responses have been Verified by an officer of Defendant. Plaintiffs' counsel has made no attempt to contact Defendants' counsel to discuss or dispute Defendant's objections.


3. To Defendant's knowledge, there are currently no outstanding discovery disputes.

4. The parties are waiting for the completion of paper discovery to schedule depositions. Defendant intends to depose the named (and joining) plaintiffs, plus Jean Boucard, and possibly Marjorie Massillon.

Respectfully submitted,

SPECTOR GADON & ROSEN, P.C.

Dated: April 4, 2013

By:  /s/ David Picker
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Defendant)	

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing Defendant's Discover Status Report was served upon the counsel listed below via ECF E-filing on this 4th day of **February**, 2013 to:

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Dated: April 4, 2013

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